

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: MARCUS JARED TAYLOR,	:	CHAPTER 13
AKA MARCUS TAYLOR, AKA	:	
MARCUS J. TAYLOR,	:	
Debtor	:	
	:	
JACK N. ZAHAROPOULOS,	:	
STANDING CHAPTER 13 TRUSTEE,	:	
Movant	:	
	:	
vs.	:	
	:	
MARCUS JARED TAYLOR,	:	
AKA MARCUS TAYLOR, AKA	:	
MARCUS J. TAYLOR,	:	
Respondent	:	CASE NO. 5:24-bk-03171-MJC

TRUSTEE'S OBJECTION TO FIRST AMENDED CHAPTER 13 PLAN

AND NOW, this 7th of January, 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, who objects to the confirmation of the above-referenced Debtor's Plan for the following reasons:

1. Failure to properly state the liquidation value in Section 1B of the Plan.
2. The Trustee avers that the Debtor's Plan is not feasible based upon the following:
 - a. The Plan is underfunded relative to claims to be paid.
3. The Debtor's Plan violates 11 U.S.C. § 1325(a)(4) in that the value of property to be distributed under the Plan on account of each allowed unsecured claim is less than the amount that would be paid on such claim if the estate were liquidated under Chapter 7. More specifically, the Debtor has excess non-exempt equity in the following:
 - a. Residential real estate. The Trustee requests proof that the Debtor is entitled to only a 1/5 interest in a Philadelphia property and not a 1/4 interest.

WHEREFORE, the Trustee alleges and avers that the Debtor's Plan cannot be confirmed, and therefore, the Trustee prays that this Honorable Court will:

- a. deny confirmation of the Debtor's Plan;
- b. dismiss or convert the Debtor's case; and
- c. provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

CERTIFICATE OF SERVICE

AND NOW, this 7th day of January, 2025, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first-class mail, addressed to the following:

Jason P. Provinzano, Esquire
Law Offices of Jason P. Provinzano, LLC
16 West Northampton Street
Wilkes-Barre, PA 18701-1708

/s/Derek M. Strouphauer, Paralegal
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee